



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

July 12, 2022

By ECF

The Honorable Alison J. Nathan, Sitting by Designation
United States District Court
Southern District of New York
United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Ghislaine Maxwell*, S2 20 Cr. 330 (AJN)

Dear Judge Nathan:

In response to the Court's June 26, 2022 Order (Dkt. No. 689), the Government and defense conferred regarding proposed redactions to motions that have not previously been docketed. The Government is today docketing nine letters previously filed by the Government, and submitting proposed redactions or sealing requests as to four of those letters. The defense has reviewed the Government's proposed redactions and does not object.

The Government's proposed redactions are consistent with the three-part test articulated by the Second Circuit in *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110 (2d Cir. 2006). Although these letters are judicial documents subject to the common law presumption of access, the limited proposed redactions are narrowly tailored to protect the privacy interests of witnesses, including individuals who are subjects of the Court's pseudonym order and information protected by Fed. R. Evid. 412, and individuals who were not called as witnesses at trial.

Respectfully submitted,

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By: _____s/

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Cc: Defense Counsel (by ECF)